# SECTION III—REMARKS

This amendment is submitted together with a Request for Continued Examination in response to the final Office Action mailed May 3, 2004, and the Advisory Action mailed October 20, 2004. Claims 1-30 and 34-36 are canceled and new claims 37-69 are added. Claims 37-69 remain pending in the application. Applicants respectfully request allowance of all pending claims in view of the above amendments and the following remarks.

## Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 1-7 and 9-36 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, U.S. Patent No. 6,081,900 to Subramaniam et al ("Subramaniam") and U.S. Patent No. 6,502,135 to Munger et al ("Munger"). Additionally, the Examiner rejected claim 8 as obvious in view of Subramaniam and Munger and further in view of U.S. Patent No. 6,502,106 to Gampper et al ("Gampper"). As to claims 1-36, Applicants submit that the Examiner's rejections are rendered moot by the cancellation of these claims.

As to new claims 37-69, Applicants respectfully traverse the Examiner's rejections. To establish a *prima facie* case of obviousness, three criteria must be met: (1) the prior art references must teach or suggest all the claim limitations; (2) some suggestion or motivation to combine the references must be found in the prior art; and (3) there must be a reasonable expectation of success. MPEP § 2143. As explained below, the Examiner has not established a *prima facie* case of obviousness.

Claim 37 recites a method combination including receiving from a terminal a first request including a composite address, the composite address including an unencrypted address of a secure server with an encrypted address of a web page concatenated thereto" and "transmitting a second request to a web site containing the web page, wherein the second request alters or omits an address of the terminal." Subramaniam does not disclose, teach or suggest a combination including the recited limitations. First, the Examiner asserts that, because a secure http connection exists between the border server 106 and the client 112, the any address information exchanged between the two is encrypted. That is not that case: in any secure http connection (*i.e.*, https connection) the address information is sent in unencrypted form. Why? Because if the address information was sent partially or wholly encrypted, the receiving server would be unable to read and interpret it; in the case of Subramaniam, the border server would be unable to determine the address of the server with which the client 112 wants to communicate.

Subramaniam therefore does not disclose, and moreover teaches against, encrypting any part of the address. Furthermore, Subramaniam does not disclose, teach or suggest that the address of the client 112 should be altered or omitted. Subramaniam therefore cannot disclose a combination including "transmitting a second request to a web site containing the web page, wherein the second request alters or omits an address of the terminal." Munger and Gampper also do not disclose, teach or suggest the claimed limitations. Subramaniam, Munger and Gampper, taken together, therefore cannot disclose, teach or suggest every limitation recited in the claim.

Claim 48 recites a machine-readable medium having stored thereon instructions to "receive from a terminal a first request including a composite address, the composite address including an unencrypted address of a secure server with an encrypted address of a web page concatenated thereto" and "transmit a second request to a web site containing the web page, wherein the second request alters or omits an address of the terminal." As discussed above in connection with claim 37, Subramaniam, Munger and Gampper do not disclose, teach or suggest a combination including these limitations and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 48 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 52 recites an apparatus including a communication unit to allow a processor to communicate with a terminal and with a web site, wherein a computer program is capable of directing the processor and the communication unit to "receive from the terminal a first request including a composite address, the composite address including an unencrypted address of a secure server with an encrypted address of a web page concatenated thereto" and "transmit a second request to the web site, wherein the second request alters or omits an address of the terminal." As discussed above in connection with claim 37, Subramaniam, Munger and Gampper do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 52 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 55 recites a method combination including "receiving at an intermediate unit a first request from a terminal including a composite address, the address including an unencrypted address of a secure server with an encrypted address of a web page concatenated thereto," forwarding the first request to the secure server, and "transmitting a second request to a web site

containing the web page, wherein the second request includes the web page address and alters or omits an address of the terminal." As discussed above in connection with claim 37, Subramaniam, Munger and Gampper do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 55 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 60 recites a machine-readable medium having stored thereon instructions to "receive at an intermediate unit a first request from a terminal including a composite address, the composite address including an unencrypted address of a secure server with an encrypted address of a web page concatenated thereto," forward the first request to the secure server, and "transmit a second request to a web site containing the web page, wherein the second request includes the web page address and alters or omits an address of the terminal." As discussed above in connection with claim 1, Subramaniam, Munger and Gampper do not disclose, teach or suggest a combination including these limitations and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 60 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 65 recites an apparatus combination including a first communication unit in a first server, wherein the first communication unit allows the first server to communicate with a terminal and with the second server, wherein the first computer program is capable of directing the processor and the communication unit to "receive a first request from the terminal including an address, the address including an unencrypted address of the second server with an encrypted web page address concatenated thereto." The claim also recites a second communication unit in a second server, wherein the second communication unit allows the second server to communicate with the terminal, the first server and a web site, and wherein a second computer program is capable of directing the processor and the communication unit to receive the first request from the first server and "transmit a second request to the web site containing the web page, wherein the second request alters or omits an address of the terminal." As discussed above in connection with claim 37, Subramaniam, Munger and Gampper do not disclose, teach or suggest a combination including these limitations and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 65 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 38-47, 49-51, 53-54, 56-59, 61-64 and 66-69, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claims 37, 48, 53, 55, 60 and 65 are in condition for allowance. Applicants submit that claims 38-47, 49-51, 53-54, 56-59, 61-64 and 66-69 are therefore allowable by virtue of their dependence on allowable independent claims, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

## Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

## Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 11-3-04

Todd M. Becker
Attorney for Applicant(s)
Registration No. 43,487

Blakely, Sokoloff, Taylor & Zafman LLP
12400 Wilshire Boulevard, Seventh Floor
Los Angeles CA 90025-1030
Phone: 206-292-8600
Facsimile: 206-292-8606

Enclosures:     Request for Continued Examination (RCE)
                Petition for three-month extension, in duplicate